Meridian.

Waiinu Energy Park

Fast-Track Referral Application
Prepared for Meridian Energy Limited

30 March 2026

Boffa Miskell

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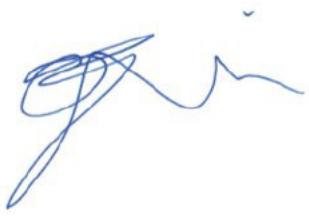
Authorised	Andrew Guerin Environmental Manager Meridian Energy Limited	
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Applicant

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2. Application Information

The information required to be included in a referral application under section 13(4) of the Fast-track Approvals Act 2024 (**FTA**) is contained within the following parts of this application:

Section 13(4) Requirement	**Application Reference** (with hyperlink to section)
(a) a description of the Project and the activities it involves	3 Project Detail
(b) an explanation of how the Project meets the criteria in section 22	4.1 Criteria for Assessing Referral Application 4.2 Appropriateness of Referring the Project Appendix 3: National and Regional Economic Benefits Appendix 4: **Strategic Alignment** and Economic Benefits Assessment
(c) information to demonstrate that the Project does not involve any ineligible activities (other than activities that may be the subject of a determination under section 23 or 24)	4.3 Demonstrating that the Project is not an Ineligible Activity
(d) a description or map of the whole Project area that identifies its boundaries in sufficient detail to enable consideration of the referral application	5 Project location Appendix 1: Map of Project Area and Boundaries (Section 13(4)(d))
(e) the anticipated commencement and completion dates for construction activities (where relevant)	6.1 Anticipated Commencement and Completion Dates for Construction Activities
(f) a statement of whether the Project is planned to proceed in stages and, if so,— (i) an outline of the nature and timing of the stages; and (ii) a statement of whether a separate substantive application is to be lodged for each of the stages; and (iii) an explanation of how each stage meets the criteria in section 22	6.2 Staging
(g) a statement of whether a part of the Project is proposed as an alternative Project in itself and, if so,— (i) a description of that part of the Project; and (ii) an explanation of how that part of the Project meets the criteria in section 22	7 Alternative Project Components
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Section 13(4) Requirement	Application Reference (with hyperlink to section)
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(i) a statement of any activities involved in the Project that are prohibited activities under the Resource Management Act 1991	9 Prohibited Activities (Section 13(4)(i))
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3. Project Detail

This section of the application provides a description of the Project and the activities it would involve in accordance with Section 13(4)(a) of the FTA.

3.1 Applicant

Meridian is Aotearoa New Zealand's largest electricity generator and generates approximately 30% of the country's electricity from renewable energy. Meridian generates electricity only from 100% renewable sources – wind, water, and sun. Meridian is a significant developer of renewable energy projects in Aotearoa New Zealand (and has overseas development and operational experience with past developments in Australia, Antarctica, United States and Tonga).

Meridian is listed on the New Zealand Stock Exchange and Australian Securities Exchange and is a mixed ownership model company, 51% owned by the New Zealand Government. Meridian's core business is the generation, marketing, trading and retailing of electricity.

The Waiinu Energy Park is a nationally significant renewable energy project being developed by Meridian.

3.2 Project Background

The Waiinu Energy Park is a nationally significant renewable energy Project combining wind and solar electricity generation, as well as battery storage. The total Project area is approximately 4,300 ha, together with a 5 km external transmission corridor to a grid connection point inland. Upon completion, Waiinu Energy Park will generate up to 1,760 GWh of renewable energy annually, enough to meet the electricity needs of 253,000 households.

The indicative Project layout is shown below in Figure 1. The wind farm would comprise four clusters of wind turbines (A–D), three clusters east of the Waitootara River. Solar arrays and battery systems would also be sited east of the river. Internal energy transmission would be via a 33kV four-circuit network, either overhead or underground, crossing the river at the existing bridge if overhead.

Overall, the Project would deliver the following significant regional and national benefits:

- Supports a low carbon future by increasing New Zealand's renewable electricity generation capacity, contributing directly to national climate change mitigation and electrification targets. This aligns with New Zealand's current target of net zero emissions by 2050 and supports Pillar 3 of the New Zealand Climate Strategy: "Clean energy is abundant and affordable."
- The Project contributes to the delivery of "Electrify NZ," a key action in New Zealand's Second Emissions Reduction Plan (2026–2030), which aims to double renewable electricity generation.
- Provides for employment opportunities for an estimated 300 - 350 full-time equivalent jobs during peak construction and a total workforce likely to exceed 3,000 individuals during construction.
- Capital investment to construct the Project will be approximately **$1.5 billion**, which is one of the largest renewable energy investment opportunities being pursued that Meridian is aware of in New Zealand.

- Due to the scale of the Project, significant investment will be required during operations, with estimated annual operational costs of **$28 m per year** for the lifetime of the Project, supporting long-term regional economic activity.
- The Energy Park would contribute 3.7% of New Zealand's current generation. It is a significant infrastructure project with national benefit from helping to bring forward contract prices back into line with the costs of additional energy supply.
- The Project also supports national infrastructure planning by aligning with the estimated $100 billion investment required by 2050 to build and maintain electricity transmission and distribution infrastructure, as identified in Boston Consulting Group's 2022 report *The Future is Electric*.
- The site's proximity and compatibility with the existing transmission corridor enhances constructability and operational efficiency, reducing the need for new transmission infrastructure and supporting grid reliability.

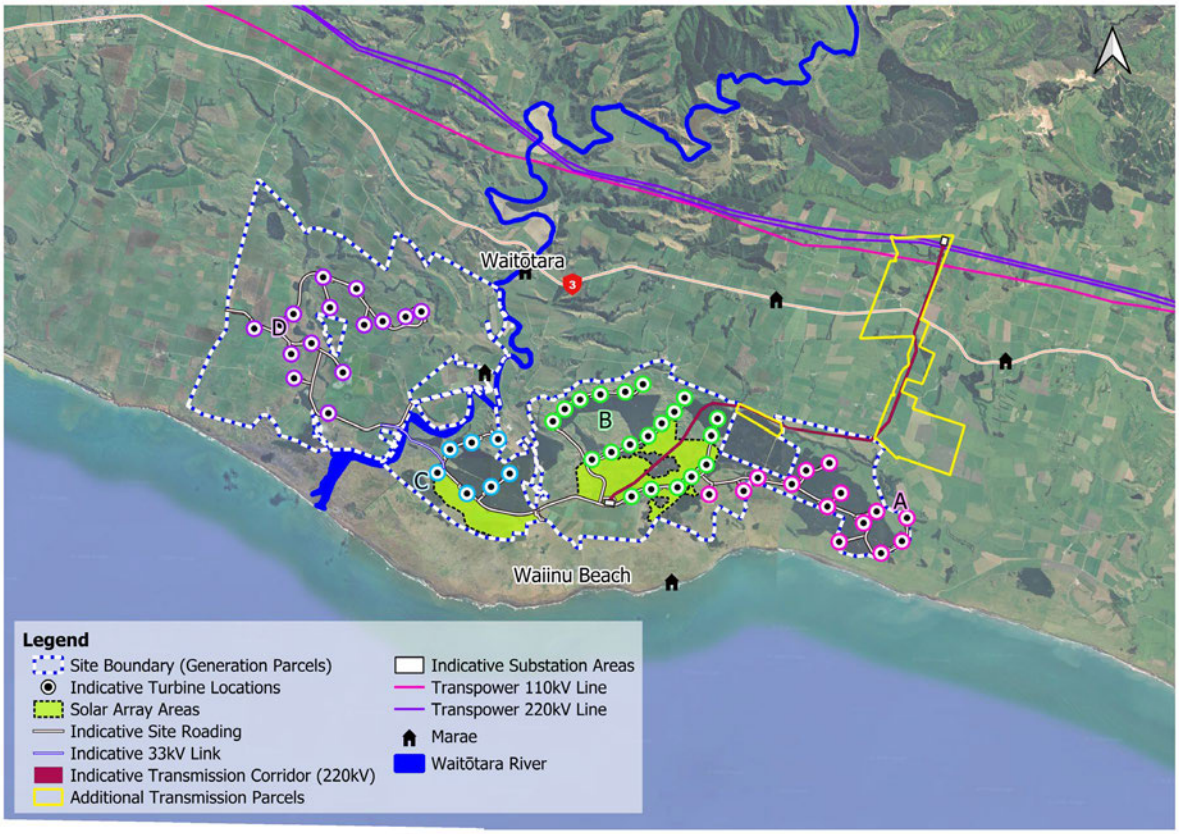

Figure 1: Indicative Waiinu Energy Park Layout

3.3 Proposed Activities

The proposed Waiinu Energy Park would include the construction and operation of wind turbines, solar arrays, a battery energy storage system (**BESS**), electrical infrastructure, internal roading, and associated facilities and services. This integrated infrastructure would enable the generation, storage, and transmission of renewable electricity from the site to the national grid.

3.3.1 Wind Farm Infrastructure

The proposal includes the installation, operation and maintenance of up to 56 wind turbines across the site, each measuring up to 250m to blade tip from ground level. Each turbine would require a dedicated foundation, crane pad, and blade laydown area for assembly and erection. Final turbine foundation designs would be determined following site-specific geotechnical investigations. Transformers for each turbine, which step up the voltage to the internal 33 kV network, would be located either inside the turbine tower or externally in a pad-mounted kiosk. Where transformers are external, their placement would be selected to minimise visual impact where practicable.

One 80 m high meteorological mast has been placed within the site footprint since 2023 to monitor the wind resource during development. Two permanent met masts would be installed during construction of the Project for operational activities. The masts will be guyed-lattice masts. The height will align with the chosen hub height, expected to be up to 165m. The guy-radius will be up to 150m.

3.3.2 Solar Farm Infrastructure

The proposal includes the installation, operation and maintenance of approximately 510,000 solar modules across 350 ha of the site. The solar array structures will be mounted on pile foundations and have a maximum height approximately 3.1 m above ground level. The solar farm will be supported by approximately 61 Power Conversion System (**PCS**) units. Each PCS unit would comprise components including inverters, transformers, switchgear, and provisions for Battery Energy Storage Systems (**BESS**). Bunds along the road boundary of the solar array structures may also be built using excess cut material.

An internal access track network will be constructed across the solar farm site from a combination of newly constructed tracks and upgrades to existing tracks where feasible, with all tracks being unsealed and approximately 4 m wide.

A power cable network is required to link the solar arrays to the PCS units and the PCS units to the substation. Cables will be underground, with trenches located beneath or alongside the access tracks.

The site would be secured with fencing, CCTV cameras, and motion-sensor or infrared lighting.

3.3.3 Battery Energy Storage Systems

The proposed DC-coupled BESS would be built on concrete or pile foundations and consist of containerised battery units, typically using 20-foot containers weighing approximately 30 tonnes each. Up to four BESS containers may be installed adjacent to each PCS unit, distributed across the site.

The BESS supports the electricity grid by supplying power during generation shortfalls, potentially reducing reliance on fossil fuel generation. The BESS also balances supply and

demand by storing power during off-peak periods and supplying it during peak demand, improving system stability and supporting renewable energy integration.

3.3.4 Supporting Energy Park Infrastructure and Activities

3.3.4.1 Internal Roading and Access

An internal road network approximately 37.5 km in length would be constructed to facilitate installation and maintenance of both the wind turbines and solar array. This road will be up to 11 m in width on the wind turbine sections. Within the solar farm, internal access roads would be unsealed, with a typical width of 4.0 m to allow maintenance and operational vehicle movements.

Two primary site entrances would be constructed – one to the east and one to the west of the Waitootara River – to enable safe and efficient transport of construction materials and turbine components. A link road would be constructed to connect the two areas internally. Access to the eastern area would be via Waiinu Beach Road and Nukumaru Station Road to Te Ranganuku Road, both of which provide connections to State Highway 3 (**SH3**). Options for access to the western area from SH3 are currently under investigation. This dual-access design avoids transporting heavy equipment across the narrow river bridge on Waiinu Beach Road and through Waitootara township and would also reduce construction traffic along that road.

3.3.5 Internal Transmission Network

Electricity from the wind turbines and solar arrays would be transmitted via a 33 kV internal network to the internal substation. These cables would generally be installed underground, particularly along internal roads, crossing the river either at the existing bridge or some other location. Solar and DC cables would be laid in bedding sand or thermal backfill material, with mechanical protection and warning tape.

3.3.6 Transmission to the National Grid and Substation

An internal substation would collect electricity from both generation sources, and the distributed BESS. This collector substation would be connected to the proposed terminal Grid connection substation via a 220 kV transmission line approximately 10 km in length, 5km of which is external to the generation site. This transmission line would consist of overhead infrastructure, including conductors and approximately 50 steel poles (up to 50 m in height).[1]

The terminal substation is to be constructed on Pākaraka Road, 2km north of State Highway 3, where the Brunswick–Stratford 220 kV National Grid transmission lines traverse the area.

3.3.7 Operations and Maintenance Facility, and Other Permanent Buildings

A permanent services and operations/maintenance building (**O&M**) would be located within the site, in a central location yet to be determined. It would include a site office, control room, workshop, and staff amenities.

A permanent switch room/control room would be located at the terminal grid connection substation for Transpower's use.

A permanent switch room/control room would also be located at the collector substation, for Meridian's use.

Two permanent stand-alone storage facilities would be located adjacent to the main O&M Building.

One permanent building would be located within the Western Solar area. Two small buildings with welfare facilities would be located at remote locations away from the O&M building.

3.3.8 Earthworks

The Proposal will require bulk earthworks associated with the installation of wind turbines, solar arrays, internal roads, substations, temporary concrete batching plants and associated infrastructure. Those earthworks include:

- Site grading and levelling to prepare areas for solar mounting systems, wind turbine foundations, wind turbine platforms, laydown areas, spoil fill sites, project offices, temporary concrete batching plant, and other infrastructure.
- Cut and fill operations to balance terrain modifications, particularly in areas with uneven topography
- Trenching for underground cabling, including solar DC and 33kV AC reticulation
- Foundation preparation for BESS units, PCS blocks, substations, and permanent buildings
- Road formation for the internal access network
- Formation preparation for public road upgrades (localised widening)
- Enabling works (including vegetation removal and erosion and sediment controls)
- Formation preparation for new access tracks to new transmission line pylons
- Formation preparation for new culverts
- Formation of visual mitigation bunds
- Quarrying for aggregates onsite.

To support the substantive application, WSP consultants have been engaged to undertake a high-level design, detailed assessment of earthworks calculations, and the potential erosion and sedimentation effects associated with these works including for the disposal of excess material. Their assessment would inform the design and implementation of appropriate mitigation measures, including the preparation of a scenario-based Erosion and Sediment Control Plan (**ESCP**).

3.3.9 Security

Final security specifications would be determined during detailed design, but would be required for the substations, solar array, and likely the O&M and storage buildings. For the solar array which covers up to 350 ha, standard "deer type" fencing would be 2.4 m high, with three rows of barbed wire, posts spaced no more than 3 m apart, and warning signage affixed at regular intervals. CCTV would be deployed at entry points and distributed throughout the site, with cameras mounted on poles and equipped with infrared or motion sensors.

3.3.10 External Lighting

External lighting would comply with AS/NZS 4282:2019 – *Control of the Obtrusive Effects of Outdoor Lighting*. Temporary portable construction lighting usage would be low and is only required for continuous concrete pours for turbine bases and some turbine lifts. There would be no permanent lighting within the solar array. Lighting at PCS units, the substation, BESS facilities, and O&M building would only operate during night-time maintenance or emergencies. Motion-activated or infrared lighting would be used for security. Lighting would be designed and oriented to avoid shining above the horizon and would only operate when staff are present or in emergency situations, including remote activation.

The project would also meet the appropriate all CAA lighting requirements with appropriate lighting on the top of the nacelles and, if required, and lighting installed mid-tower.

3.3.11 Construction Logistics

Most components for the Project, including wind turbines, are expected to be shipped from overseas via Port Taranaki, approximately 145 km from the site via SH3 or 165 km via SH45 for oversized loads. While road transport would be the primary delivery method, rail transport is also being investigated for containerised equipment (including solar farm components). Preliminary discussions with KiwiRail suggest rail delivery from CentrePort Wellington is a viable option for such equipment.

Construction materials, such as aggregates, would be sourced from local suppliers where possible, including within-site quarries, to minimise traffic movements. An aggregate supply assessment is underway to confirm options.

Water would be required for construction activities, including concrete production, dust suppression, and roadworks. Potential sources include rainwater harvested from site buildings, water captured in sediment control structures, ground water bores, surface takes or purchased and delivered via tanker. Water use for construction activities is not being sought as part of this fast-track application, as the specific volumes and sources are yet to be confirmed. A separate bespoke water permit(s) will be sought to authorise this use once further details are available.

Concrete batching plants would be established on site at locations determined by the final construction plan. Each plant would typically include a mobile batching unit, cement silos, aggregate stockpiles, water tanks, and support facilities such as offices and amenities. These facilities would be removed following construction. Diesel storage would also be provided on site, with steel tanks featuring secondary containment and portable fuel containers used as needed.

Temporary buildings would include Portacom structures for use as offices, security facilities, and staff amenities (e.g., cookhouses). These would be single-storey, modular, and removed at the end of the construction phase.

Dewatering may be required in some instances during construction, particularly for trenching associated with underground cabling. While ground conditions at the site suggest that dewatering is unlikely to be necessary in most areas, localised dewatering may be needed to manage groundwater ingress. Any dewatering activities are expected to be short-term and would be managed in accordance with best practice sediment and water control measures.

3.3.12 Mitigation, Habitat Improvement / Restoration, and Offsetting

A full description of the potential adverse effects of the Project and the proposed mitigation approach is provided in Section 8. The Project adopts a mitigation hierarchy approach, with a

focus on avoiding and minimising effects through Project siting and design, followed by remediation and mitigation measures within the Project footprint. Detailed mitigation measures will be developed and confirmed through the substantive application.

For the most part, mitigation will be implemented on-site and will include a range of habitat improvement and restoration initiatives to address adverse effects and enhance existing ecological values. These are anticipated to include waterway enhancement works, wetland restoration and creation, riparian planting, and broader enrichment planting to improve habitat quality and ecological connectivity across the site.

Notwithstanding these measures, there may be residual adverse effects that cannot be fully managed on the project site. In such cases, ecological offsetting may be proposed to address those residual effects. Any offsetting is expected to occur outside the Project footprint and will be designed in accordance with best practice principles to achieve measurable biodiversity gains.

The overall mitigation and offsetting package will continue to be refined through ongoing technical assessment and engagement with mana whenua, the local community, and key stakeholders, and will be detailed in the Substantive Application.

4. Activity Eligibility

This section confirms the eligibility of the Project for Fast Track Approval in accordance with Sections 13(4)(b)-(c) of the FTA.

4.1 Criteria for Assessing Referral Application

Section 22 of the FTA sets out the criteria for accepting a referral application as follows:

(a) the Project is an infrastructure or development Project that would have significant regional or national benefits; and

(b) referring the Project to the fast-track approvals process—

  (i) would facilitate the Project, including by enabling it to be processed in a more timely and cost-effective way than under normal processes; and

  (ii) is unlikely to materially affect the efficient operation of the fast-track approvals process.

Subsection (2) outlines matters that the Minister may consider in making their decision.

Consideration of each of these criteria, including the matters specified in Section 22(2), is provided below.

4.1.1 Significant Regional or National Benefits

The regional and national benefits of the Project have been considered by Thomas Brent Layton, an economic expert in electricity market design and regulation, and a former Chair of the Electricity Authority. His assessment, attached as **Appendix 3**, outlines the significant national and regional benefits of the Waiinu Energy Park Project, including its contribution to dry year risk management, electricity market efficiency, and future energy demand.

In addition, further Regional and National Benefits of the Project are described in detail in **Appendix 4** of this Application.

The Project is also strongly aligned with the strategic direction set out in the National Infrastructure Plan (2026) prepared by Te Waihanga New Zealand Infrastructure Commission. The Plan identifies electricity generation, transmission, and distribution as nationally significant infrastructure requiring coordinated and accelerated investment to:

- support electrification of transport and industry
- maintain security of supply and resilience to climate and dry-year risk
- enable economic growth and productivity, and
- transition to a low-emissions energy system.

The National Infrastructure Plan recognises that substantial additional renewable generation capacity will be required over coming decades to meet growing electricity demand, manage dry year risk, and its role in decarbonisation. It emphasises the need for timely consenting pathways and long-term infrastructure planning certainty to avoid supply shortfalls and escalating costs.

In the current global context, volatility in international energy markets, particularly arising from the conflict in the Middle East and associated disruptions to oil supply, has reinforced the

importance of energy security and supply diversification for countries such as New Zealand. While New Zealand's electricity system is largely renewable, it remains indirectly exposed to global fossil fuel markets through thermal generation, industrial energy use, and price-setting dynamics. This has resulted in increased price volatility and heightened risks to affordability and reliability of energy supply. The Project provides a significant long-term national benefit by increasing domestic renewable generation capacity and reducing reliance on internationally traded fossil fuels. In doing so, it enhances energy independence, improves resilience to global supply shocks, and contributes to a more stable and predictable electricity pricing over time. The Project therefore responds not only to long-term decarbonisation objectives, but also to near-term geopolitical risks affecting energy systems globally.

In summary, the Project would deliver the following significant regional and national benefits, such that the first criteria are met:

- The Project is an infrastructure Project.
- The generation of 1,760 GWh of renewable electricity per year is enough to power up to 253,000 households, representing up to 12% of private dwellings in New Zealand.
- The Project supports a low carbon future by increasing New Zealand's renewable electricity generation capacity, contributing directly to national climate change mitigation and electrification targets. This aligns with New Zealand's current target of net zero emissions by 2050 and supports Pillar 3 of the New Zealand Climate Strategy: "Clean energy is abundant and affordable".
- The Project contributes to the delivery of "Electrify NZ," a key action in New Zealand's Second Emissions Reduction Plan (2026–2030), which aims to double renewable electricity generation.
- It provides for employment opportunities for an estimated 300 - 350 full-time equivalent jobs during peak construction and a total workforce likely to exceed 3,000 individuals during construction.
- Capital investment to construct the Project will be approximately **$1.5 billion**, which is one of the largest renewable energy investment opportunities being pursued that Meridian is aware of in New Zealand.
- Due to the scale of the Project, significant investment will be required during operations, with estimated annual operational costs of **$28 m per year** for the lifetime of the Project, supporting long-term regional economic activity.
- The Energy Park would contribute 3.7% of New Zealand's current generation and is therefore a significant infrastructure project with national benefit from helping to bring forward contract prices back into line with the costs of additional energy supply.
- The Project also supports national infrastructure planning by aligning with the estimated $100 billion investment required by 2050 to build and maintain electricity transmission and distribution infrastructure, as identified in Boston Consulting Group's 2022 report *The Future is Electric*.
- The Project supports coordinated national infrastructure planning by aligning with the substantial long-term investment requirements in generation, transmission, and distribution infrastructure identified by both the National Infrastructure Plan and previous sector analyses.
- The site's proximity and compatibility with the existing transmission corridor enhances constructability and operational efficiency, reducing the need for new transmission infrastructure and supporting grid reliability.

4.2 Appropriateness of Referring the Project

4.2.1 Referring the Project would Facilitate it in a more Timely and Cost-Effective way

Under the Resource Management Act 1991 (**RMA**), the proposed Waiinu Energy Park Project would require Meridian to obtain resource consents from four separate local authorities, as the Project crosses the boundaries of four councils: South Taranaki District Council and Taranaki Regional Council (both of which have jurisdiction over the western part of the site), and Whanganui District Council and Horizons Regional Council (both of which have jurisdiction over the eastern part of the Project Area). The need to secure authorisations from multiple councils, each with different plans, policy frameworks, and consenting processes, adds substantial complexity to the consenting process.

Given the cross-boundary nature of the proposal, a joint consenting process would be necessary to streamline assessments and avoid duplication. Outside of the Fast-track Approvals regime, there are three primary statutory consenting pathways under the RMA that could be used to coordinate a joint consenting approach and authorise the Project:

- The standard resource consent process under Part 6 of the RMA, where each council would process their respective consents. This option would involve multiple, potentially overlapping decision makers, with hearings and public notification, likely resulting in inconsistent timeframes, duplication in consent conditions and increased processing complexity. The potential for appeals to the Environment Court increases the uncertainty, cost, duration and complexity of the consenting process.
- A Board of Inquiry process under Part 6AA, available for proposals of national significance. This process is initiated by the Minister for the Environment (at the Minister's own initiative or in response to a request from the local authority or the applicant) and enables a streamlined single hearing process before a Board appointed by the Minister. It is generally faster than the standard consent process but involves a high resourcing cost, both for the Applicant and all participants.
- A Direct Referral to the Environment Court under sections 87D–87I and 198B, where the applicant can request that the councils refer a resource consent application directly to the Environment Court for a decision. If this process is agreed to by the councils it bypasses a council hearing and thus removes one hearing from the process, but it still involves a full merits-based court hearing and a complex consenting process.

Each of these pathways, while well established, typically involves lengthy pre-application engagement, extensive technical reporting, public notification and submission processes, detailed evidence preparation, and potentially protracted hearings and appeals. Depending on the process chosen and the level of public interest or opposition, it is estimated that consent authorisation using these ‘standard’ processes could take anywhere from 2 to 4 years+. These processes are also resource-intensive, with a project of this nature and scale requiring the engagement of a multi-disciplinary team of technical experts, planners, and legal counsel.

In contrast, the Fast-track Approvals process provides a timelier and more cost-effective pathway, providing a one stop shop for all consents, authorities and permits that enables an integrated consideration of the Energy Park. The process is administered by an expert panel appointed by the Minister and follows clear statutory timeframes, providing greater certainty for Project delivery. It also allows for the coordinated consideration of multiple resource consents across jurisdictional boundaries, helping to streamline approvals where several authorities are involved. As such, the Fast-track process is considered an efficient and proportionate

mechanism for progressing a Project of this scale and complexity, while still ensuring that environmental effects are appropriately assessed and managed.

Obtaining the Wildlife and Archaeological permits necessary for the Project as part of a 'one stop shop' will further improve the efficiency and effectiveness of the overall approvals pathway.

4.2.2 Referral would be Unlikely to Materially Affect Efficient Operation of the Fast-Track Approvals Process

The referral of the Project is not anticipated to materially affect the efficient operation of the Fast-track Approvals process. The Project is at an advanced stage of development, with a comprehensive suite of technical assessments either already completed or underway and soon to be completed. In addition, Meridian has undertaken, and continues to undertake, comprehensive engagement with Mana Whenua, the local community and stakeholders (as detailed in **Appendix 5**).

This level of readiness ensures that the Expert Panel would have a well-defined information base upon which to assess the application, reducing the likelihood of delays commonly associated with incomplete or under-developed proposals. In addition, when compared with other listed Projects and referred Projects, many of which are at earlier stages of planning or design development, this proposal is unlikely to create undue pressure on the processing system or delay the progression of other applications. The Project is well-placed to proceed efficiently through the Fast-track process, without imposing an undue burden on the system or compromising the integrity of decision-making on this or other projects.

4.3 Demonstrating that the Project is not an Ineligible Activity

Activities that are ineligible for referral under the Fast-track Approvals process are identified in Section 5 of the FTA. An assessment of the Waiinu Energy Park Project against each of these ineligible activity categories is provided in **Table 1** below.

Table 1: Ineligible Activities Assessment

Ineligible activity	Compliance
(a) An activity that – (i) would occur on identified Māori land; and (ii) has not been agreed to in writing by the owners of the land or been subject to a determination under section 23:	**Complies** – The Project does not involve identified Māori land without consent or determination.
(b) An activity that – (i) would occur in a customary marine title area; and (ii) has not been agreed to in writing by the customary marine title group:	**Complies** – The Project is not located within a customary marine title area.
(c) An activity that – (i) would occur in a protected customary rights area; and (ii) would have a more than minor adverse effect on the exercise of the protected customary right; and	**Complies** – The Project would not occur in a protected customary rights area.

Ineligible activity	Compliance
(iii) has not been agreed to in writing by the protected customary rights group:	
(d) An activity that would occur on either of the following classes of land: (i) Māori customary land: (ii) land set apart as a Māori reservation as defined in section 4 of Te Ture Whenua Māori Act 1993:	**Complies** – The Project does not occur on Māori customary land or on land reserved under Te Ture Whenua Māori Act 1993.
(e) An aquaculture activity or an activity that is incompatible with aquaculture activities— (i) that would occur within an aquaculture settlement area declared under section 12 of the Māori Commercial Aquaculture Claims Settlement Act 2004 or an area reserved under another Treaty settlement for the aquaculture activities of a particular group; and (ii) for which the applicant who is proposed to hold an approval described in section 42(4)(a) (resource consent) is not authorised to apply for a coastal permit under the Resource Management Act 1991:	**Does not apply** – The Project does not involve aquaculture activities.
(f) An activity— (i) that would require an access arrangement under section 61 or 61B of the Crown Minerals Act 1991; an (ii) that— (A) could not be granted an access arrangement because of section 61(1A) of that Act; or (B) would occur in an area for which a permit cannot be granted under that Act:	**Does not apply** – No access arrangement is required under the Crown Minerals Act 1991.
(g) An activity that would be prevented under section 165J, 165M, 165Q, 165ZC, or 165ZDB of the Resource Management Act 1991:	**Complies** – The Project is not prevented under these provisions of the RMA.
(h) An activity (other than an activity that would require an access arrangement under the Crown Minerals Act 1991) that— (i) would occur on land that is listed in Schedule 4; and (ii) has not been subject to a determination under section 24:	**Does not apply** – The site is not listed in Schedule 4 and has not been the subject of a section 24 determination.
(i) An activity that— (i) would occur on a national reserve held under the Reserves Act 1977; and (ii) requires approval under that Act; and (iii) has not been subject to a determination under section 24:	**Does not apply** – The site is not on a national reserve.
(j) An activity that—	**Does not apply** – The site is not on a reserve held under the Reserves Act 1977.

Ineligible activity		Compliance
	(i) would occur on a reserve held under the Reserves Act 1977 that is vested in someone other than the Crown or a local authority; and (ii) has not been agreed to in writing by the person or persons in whom the reserve is vested:	
(k)	An activity that— (i) would occur on a reserve held under the Reserves Act 1977 that is managed by someone other than the Department of Conservation or a local authority; and (ii) has not been agreed to in writing by the person or persons responsible for managing it:	**Does not apply** – The site is not on a reserve held under the Reserves Act 1977.
(l)	An activity that is— (i) a prohibited activity under the Exclusive Economic Zone and Continental Shelf (Environmental Effects) Act 2012 or regulations made under that Act; or (ii) an activity that is described in section 15B of the Resource Management Act 1991 and is a prohibited activity under that Act or regulations made under it; or (iii) an activity that is prohibited by section 15C of the Resource Management Act 1991:	**Does not apply** – None of the listed Acts or prohibited activity provisions apply to the Project.
(m)	A decommissioning-related activity (which is an activity described in section 38(3) of the Exclusive Economic Zone and Continental Shelf (Environmental Effects) Act 2012):	**Does not apply** – The Project does not involve decommissioning-related activities within the EEZ.
(n)	An activity undertaken for the purposes of an offshore renewable energy Project.	**Does not apply** – The Project is not an offshore renewable energy Project.

5. Project location and environs

This section provides a description of the Project area to satisfy the requirements of Section 13(4)(d) of the FTA. In addition, **Appendix 1** provides plans of the Project site, including the site boundaries.

5.1 Project Location

The Waiinu Energy Park is located on farmland within the coastal plains of South Taranaki and northwestern Whanganui, near the township of Waitootara. The project site is located entirely within the ancestral lands of Ngaa Rauru Kaiitahi. The structures within the Energy Park lie at least half a kilometre inland from the coastline and occupies undulating duneland terrain on the coastal side of the Marton–New Plymouth Railway Line.

5.2 Project Environs

The Energy Park comprises two main areas separated by the Waitootara River. The western area is primarily dairy farmland, while the eastern area consists of mixed grazing land and pine plantation forestry on extensive duneland. The grid connection from the site would run northeast from the eastern edge of the Energy Park, traversing farmland and rising terrain to connect to transmission infrastructure approximately 4.2km inland from the generation site boundary, at an elevation of around 200m, some 6.8km from the nearest coastline.

Much of the duneland has been heavily modified by historic earthworks for farming activities and plantation forestry. Inland of the railway, the land rises quickly, with State Highway 3 – located up to 2km further inland – elevated at around 120–140m above sea level, offering occasional views over the coastal plain.

The Project area is characterised by a network of waterbodies and catchments that form an important part of the wider coastal and riverine environment. The Waitootara River is the dominant waterbody, flowing through the site for approximately 8 km and forming part of a large catchment extending inland toward the Whanganui National Park. The Waiau Stream also traverses the western portion of the site, connecting a series of inland lakes and wetlands with the Waitootara River mouth.

Within and surrounding the Project area are numerous freshwater features, including lakes, dune swale wetlands, riverine margins, and estuarine environments. Several of these wetlands and associated habitats are recognised as having elevated ecological values, including areas identified as Significant Natural Areas, Key Native Ecosystems, and Regionally Significant Wetlands. These features, along with riparian corridors and dune systems, provide important habitat for indigenous species and form ecological linkages across the landscape.

As outlined in Appendix 7 and Section 8, the Project has been shaped to avoid, as far as practicable, these key waterbodies and habitats, including the Waitootara River, inland lakes, wetlands, and associated ecological corridors. Where interaction with smaller or modified features is required, effects will be appropriately managed through design, setbacks, and mitigation measures.

The township of Waitootara is approximately 2km upstream of the site at its closest point, where State Highway 3 crosses the Waitootara River. The other closest settlement is Waiinu Beach, some 7.7km to the south of Waitootara. The community of Nukumaru is located further inland along State Highway 3, some 6km east of Waitootara.

The Project area and its wider environs are of cultural significance to Ngaa Rauru Kaiitahi and associated hapū, reflecting long-standing occupation and connection to the coastal plains, dune systems, waterways, and surrounding landscapes. Cultural values within the area include marae, wāhi tapu, archaeological sites, and areas of Māori land, which collectively contribute to the cultural landscape and ongoing use of the rohe. These features are illustrated the map provided in **Appendix 2**.

Five marae are located in the area, four active and one historic: Te Ihupuku Marae (between Waitootara and Waiinu Beach) which is located within the overall project area, Tauranga Ika Marae (at Nukumaru, SH3), Kaipoo Marae (in Waitootara township) and Paakaraka Marae (at Pākaraka) are located to the north of the project area, as well as the site of the former Herehere i Moana Marae (on the coast southeast of Waiinu Beach). There are eight other marae of Ngaa Rauru Kiitahi that rely on the overall environs of the rohe to function.

The wider area also includes statutory acknowledgement areas identified under the Ngaa Rauru Kaiitahi Claims Settlement Act 2005, including Nukumaru Recreation Reserve and the Tapuarau Conservation Area (Hawkens Lagoon), both of which are located in proximity to, but outside, the Project footprint. These areas reflect the recognised cultural, spiritual, historical, and traditional association of Ngaa Rauru Kaiitahi with the coastal and riverine environment and contribute to the broader cultural landscape within which the Project is located. Further detail on these statutory acknowledgements is provided in Section 10.3.

Whanganui is located 20km southeast of the Project site, while Hāwera is nearly 50km northwest of the Project site. Mercury's Waipipi Wind Farm is situated approximately 7km northwest of the Project site, along the coast between Waverley and Pātea.

Land use in the surrounding area is predominantly dairy farming and cropping, with sheep and beef grazing on less productive soils. Commercial pine forestry is prominent across the coastal dune areas, where most of the proposed Energy Park is located.

The topography of the Project area is shown in **Figure 2** below

Boffa Miskell

www.boffamiskell.co.nz

0 1 km

1:45,000 @ A3

Data Sources: Meridian Energy Limited, Landcare Research, Taranaki Regional Council.Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, © OpenStreetMap contributors, and the GIS User Community, Eagle Technology, Land Information New Zealand

Projection: NZGD 2000 New Zealand Transverse Mercator

Site Boundary (V07-03)

Transmission Titles (V02)

WAIINU RENEWABLE ENERGY PARK - PLANNING SERVICES

Site Topography

Date: 26 March 2026 | Revision: 1

Plan prepared for Meridian Energy Limited by Boffa Miskell Limited

Project Manager: s 9(2)(a) | Drawn: JWa | Checked: CHo

6. Timing and Staging

The timing and staging of the proposal are discussed below to satisfy the requirements of Sections 13(4)(e) and 13(4)(f) of the FTA.

6.1 Anticipated Commencement and Completion Dates for Construction Activities

Construction of Waiinu Energy Park is scheduled to commence in Q3 2028, with all infrastructure becoming fully operational by Q2 2031, and full commissioning expected by Q3 2033. This timeline allows for progressive delivery of renewable energy capacity while managing construction complexity and ensuring efficient integration with the National Grid. These dates and durations, and those in the following section are indicative only and subject to change.

6.2 Staging

While Meridian is not intending to undertake the Project in severable independent stages, it does anticipate sequencing the construction in four stages of development as follows:

- **Stage 1** (Q3 2028 – Q3 2030):

  The establishment of 41 wind turbines east of Waitootara river in Sections A, B and C (see **Figure 3**), along with transmission and grid connection infrastructure, and associated enabling works including access, civil infrastructure, and electrical connections.

- **Stage 2** (Q3 2030 – Q2 2031):

  The establishment of the remaining 15 wind turbines west of Waitootara river, located in Section D (see **Figure 3**), with associated transmission infrastructure and enabling works.

- **Stage 3** (Q4 2030 – Q1 2032):

  The establishment of solar photovoltaic arrays within the Western Solar Array area (see **Figure 3**), battery energy storage systems (BESS), associated enabling works, additional grid integration components, and any necessary scaling of site facilities.

- **Stage 4** (Q3 2031 – Q3 2033):

  The establishment of solar photovoltaic arrays within the Eastern Solar Array area (see **Figure 3**), battery energy storage systems (BESS), associated enabling works, additional grid integration components, and any necessary scaling of site facilities.

The Project would be advanced as a single integrated Project under the Fast-track Approvals process. It is not intended that separate substantive applications will be lodged for each stage.

Each stage forms part of a cohesive and nationally significant renewable energy development and is expected to deliver substantial benefits both independently and cumulatively:

- **Stage 1** will deliver early emissions reductions and grid capacity benefits by establishing a significant portion of the renewable generation and storage infrastructure.

- **Stage 2** will build on this foundation, completing the full wind generation capacity and further enhancing resilience and supply security.
- **Stages 3 and 4** will expand the Project's solar generation and storage capacity, supporting long-term energy needs and grid flexibility.

All stages will efficiently contribute to the Government's climate and energy objectives. The design, application, and implementation strategy ensure that each stage is appropriately consented, constructible, and aligned with the purpose and intent of the FTA.

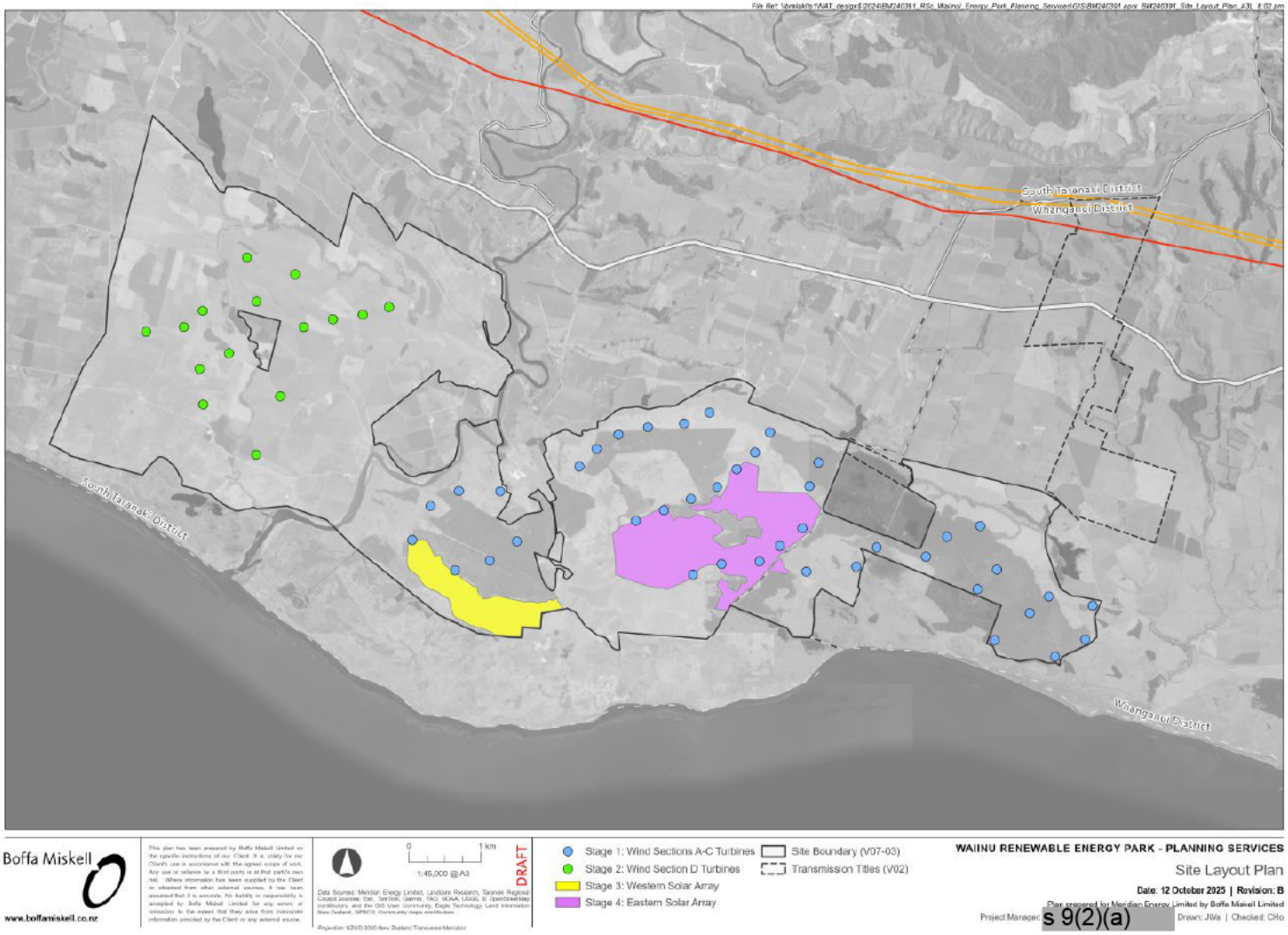

Figure 3: Indicative Staging Areas: Stage 1 – Wind Sections A, B and C; Stage 2 – Wind Section D; Stage 3 – Western Solar Array; Stage 4 – Eastern Solar Array.

7. Alternative Project Components

For the purposes of Section 13(4)(g) of the FTA, no part of the Waiinu Energy Park is proposed as an alternative Project in itself. The Project is being delivered as a fully integrated renewable electricity generation development comprising wind generation, solar generation, battery storage, and grid connection infrastructure. Each component is functionally and operationally linked, and together they are designed to optimise generation output, energy storage, and network support. As no alternative Project component is proposed, Section 13(4)(g)(ii) is not applicable. All elements form a single cohesive Project that meets the criteria under Section 22 of the FTA.

8. Known Adverse Effects

This section provides a description of the known adverse effects of the Project and the significance of those adverse effects in accordance with Section 13(4)(h) of the FTA. In addition, **Appendices 6 - 9** provide specific technical memoranda to describe the landscape, ecological, archaeological and acoustic effects.

8.1.1 Landscape and Visual

A Landscape and Visual Effects Memorandum has been prepared by Boffa Miskell Limited and is included as **Appendix 6**. This assessment outlines the known and anticipated landscape and visual effects associated with the Waiinu Energy Park, including the wind turbines, solar arrays, battery storage units, and associated infrastructure. It is noted that a full assessment of landscape and visual impacts will be provided to support the substantive application.

The assessment has been informed by multiple site visits, including:

- General site and landscape visits in February 2023, January 2024, June 2025, and February 2026
- Cultural heritage site visits (marae and sites of significance) on 25 September 2024 and 25 November 2025
- A site walkover with Te Kaahui o Rauru on 29 June 2025, and
- Residential amenity assessments at identified properties in May, June, September, and November 2025.

The memo confirms that, as is invariably the case for utility-scale wind farms, the Project will result in landscape and visual change within the surrounding environment. The area is currently characterised by coastal dunelands, pastoral farming, pine forestry, and open rural landscapes. The most prominent elements, namely the wind turbines, will be visible from a broad area, including sections of State Highway 3, nearby settlements, and elevated inland vantage points.

Importantly, the Project has been deliberately sited to avoid sensitive landscape overlays such as Outstanding Natural Features and Landscapes (**ONFL**), areas of Outstanding Natural Character (**ONC**), and the coastal environment. Infrastructure placement has been guided by the need to protect key natural features and areas of cultural significance.

While some areas within and near the site will experience low–moderate to high adverse landscape and visual effects, these are not considered significant in the context of the broader landscape. The effects are expected to diminish with distance and are not anticipated to be overwhelming, overbearing, or inescapably dominant for affected viewers.

The layout has been designed to respond sensitively to the existing landscape character, informed by iterative Project shaping to respond to the receiving environment. This includes:

- A minimum distance of 1.7 km from the settlement at Waiinu Beach
- Removal and reconfiguration of turbines to reduce visual amenity effects for nearby residents and a nearby marae
- Setbacks of 0.4 to 1.5 km from the coastal edge to retain the remote and wild characteristics of the adjacent coastal landscape
- Avoidance of ONFLs and ONCs, and

- Siting within a landscape already modified by agriculture, forestry, and existing infrastructure.

With these measures in place, the Project is not anticipated to result in any significant adverse effects on landscape character, natural character, or visual amenity beyond localised effects that are not out of proportion with the national and regional benefits of the Project.

There is potential for dwellings located within proximity of a proposed turbine to be affected by shadow flicker. Actual effects would depend on a number of factors such as orientation and size of the windows at the property, position of the sun, and duration of effect. The substantive assessment will identify which properties may experience shadow flicker effects and, should this be identified, proposed appropriate mitigation, such as turbine shutdown, would be implemented during those times in order to avoid the effect.

8.1.2 Ecological Effects

An Ecological Effects Memorandum has been prepared by Boffa Miskell Limited and is included as **Appendix 7**. The memo outlines the findings of initial ecological surveys and assessments undertaken between 2023 and 2025 to identify potential effects of the Project on five key ecological values: indigenous lizards, bats, and birds; indigenous vegetation, and freshwater habitats (wetlands and rivers). It is noted that a full assessment of ecological effects will be provided to support the substantive application.

The site is predominantly modified, comprising grazed pasture and exotic forestry, with only small remnants of indigenous habitat. Targeted and ongoing surveys confirm the presence of some ecological values within the site and adjacent areas, including wetlands and habitat for Australasian bittern, long-tailed bats, and lizards. The Energy Park has been sited and designed to avoid those habitats as far as practicable.

The data collected has been used to develop constraints maps, which have been discussed in workshops with Meridian Energy to shape the Project to seek to avoid as far as practicable indigenous habitats and habitats of indigenous fauna. This is a standard Project shaping process that Meridian follows, working closely with its technical experts to minimise environmental effects.

Cumulative effects on ecological values have also been, and will continue to be, considered as part of the Project's assessment. This includes consideration of the Project in combination with other existing and reasonably foreseeable developments in the wider area, including other existing wind farm developments such as the Waipipi Wind Farm.

Potential adverse effects, such as habitat disturbance and fauna displacement during construction, are anticipated to be localised and can be appropriately avoided, remedied, minimised or offset through established best-practice measures. These measures have been informed by extensive ecological fieldwork and Project shaping, and include:

- Siting of infrastructure to avoid identified sensitive habitats, including wetlands, lakes, and riparian margins. Buffers have been incorporated around sensitive ecological features, including a confirmed coastal setback of between 0.4 to 1.5km.
- Lizard salvage protocols in localised habitat patches, with capture and relocation to protected and managed habitat areas. A Lizard Management Plan will be submitted with the substantive application.
- Bat activity-based turbine management, including pre- and post-construction monitoring, and consideration of commuting routes and setbacks. A Bat Monitoring and Management Plan will be submitted with the substantive application.

- Collision risk management for key avifauna species, including blade tip ground clearance set at 50 m to reduce strike risk and setback distances from blade tips of 200 m from identified habitats. Species-specific monitoring (e.g. for Australasian bittern) will be undertaken, and offsetting will be considered if necessary (particularly for Australasian bittern and long tail bats). An Avifauna Monitoring and Management Plan will be submitted with the substantive application.
- Freshwater protection, requiring stream crossings to be minimised and a Freshwater Management Plan to ensure fish passage and habitat quality are maintained.

These measures, along with a set of robust consent conditions, will be designed to ensure that no significant adverse ecological effects result from the Project.

8.1.3 Earthworks and Sedimentation Effects

Earthworks would be required throughout the site for the construction of access tracks, turbine and solar foundations, cable trenches, substation platforms, and associated infrastructure. These activities have the potential to generate sediment-laden runoff if not appropriately managed.

To support the substantive application, WSP consultants have been engaged to undertake a detailed assessment of the potential erosion and sedimentation effects associated with these works. Their assessment would inform the design and implementation of appropriate mitigation measures, including the preparation of a scenario based approach Erosion and Sediment Control Plan (**ESCP**).

The ESCP would be developed in accordance with industry best practice, including relevant regional guidelines and standards. It would ensure sediment discharge is minimised through measures such as stabilised accessways, diversion bunds, sediment retention ponds, silt fencing, and progressive site stabilisation. As such, the adverse effects of earthworks and sedimentation on the surrounding environment are expected to be appropriately managed and mitigated.

With implementation of the ESCP, the adverse effects of earthworks and sedimentation are anticipated to be temporary, localised, and minor.

8.1.4 Contaminated Land Effects

A Preliminary Site Investigation (**PSI**) has been undertaken throughout the site. The PSI has indicated that there are seven registered Hazardous Substances and Industries List (**HAIL**) sites and six potential HAIL sites in the vicinity of the Project footprint. Based on the indicative Project design, it is anticipated that the majority, if not all, HAIL sites will be avoided.

While the risk of encountering contaminated land is considered low – given the site's existing use for pastoral farming, plantation forestry, and undeveloped landscapes – any identified contamination would be appropriately managed in accordance with best practice and regulatory requirements. This may include site-specific remediation, the implementation of a Contaminated Land Management Plan, and the safe handling and disposal of any contaminated material.

These investigations and management measures would ensure that any potential adverse effects associated with contaminated land are appropriately addressed and that the Project does not pose a risk to human health or the environment.

8.1.5 Traffic Effects

Traffic effects associated with the construction and operation of the Waiinu Energy Park will be assessed by WSP, who have been engaged to prepare a detailed Transportation Assessment in support of the substantive application. This assessment will consider expected vehicle movements, access arrangements, road safety, and the suitability of the local road network to accommodate the scale of the Project.

While an increase in construction traffic is anticipated during the delivery of large components and materials to the site, any adverse traffic effects are expected to be appropriately managed through the implementation of an Integrated Traffic Management Plan. This plan would address site access design, traffic routing, delivery timing, safety measures, and coordination with relevant road controlling authorities and, if necessary, KiwiRail (in regard to rail crossings and overbridges).

The application would include appropriate mitigation measures to ensure traffic-related effects are minimised and that the safety and efficiency of the local transport network is maintained.

8.1.6 Community/Social Effects

The Waiinu Energy Park is located in a rural coastal setting with a small number of residential dwellings in the project area, primarily associated with farming operations. The nearest settlements are Waitootara township, to the north of the Project, and Waiinu Beach, to the south.

Meridian has undertaken comprehensive engagement with the local community and directly affected neighbours throughout the early stages of the Project. This engagement has included meetings, site visits, information sessions, and ongoing correspondence to ensure that local perspectives, questions, and concerns are understood and considered in the design and development of the Energy Park. A summary of this engagement is provided in **Appendix 5**.

Potential amenity effects on the community – including those relating to landscape and visual changes, noise, and traffic movements – have been addressed through the preparation of technical assessments that would support the substantive application. These include:

- A Landscape and Visual Effects Assessment to be prepared by Boffa Miskell Limited, which identifies and assesses visibility and character impacts
- A Noise Assessment being prepared by Marshall Day Acoustics, which assesses operational and construction noise effects relative to existing environment, and
- A Traffic Assessment being prepared by WSP, which would address construction and operational traffic effects, including access design and management.

In addition, a Social Impact Assessment has been prepared and will be finalised and included in the substantive application.

8.1.7 Cultural Effects

As shown in the engagement record **(Appendix 5**), Ngaa Rauru Kiitahi (through their PSGE – Te Kaahui o Rauru) and Meridian have been engaging on this project since 2021. Through this engagement, Meridian has been made aware of a number of actual and potential adverse cultural effects that generally fall into the following categories:

- Ability to revitalise Ngaa Raurutanga, including through observance of Te Kawa Ora (the central principle set out in Ngaa Rauru Kiitahi planning documents).
- Restoring Te Taiao, and arresting the decline of native species and habitats (noting the unique ecology of the area is intimately entwined with Ngaa Raurutanga).
- Landscape and outlook necessary to maintain cultural practices, including from marae and other tongi.
- Ability to utilise whenua māori, including reverse sensitivity type impacts on papakāinga.
- Ability to participate in and benefit from having a project like this in the takiwaa of Ngaa Rauru Kiitahi.
- Upholding the guarantees of the Ngaa Rauru Kiitahi Te Tiriti settlement process, including the revitalisation of Ngaa Raurutanga. Of direct relevance being the recognition of the significant contribution that Ngaa Rauru Kiitahi has already made to Aotearoa New Zealand as a nation in foregoing full redress for their loss as a result of the Crown's breaches of Te Tiriti in accepting the Te Tiriti Settlement.

There are five marae located in proximity to the Project site, including Te Ihupuku Marae, located near the Waitootara River between Waitootara and Waiinu Beach; Tauranga Ika Marae at Nukumaru on State Highway 3; Kaipoo Marae in Waitootara township; Paakaraka Marae, located on State Highway 3 in Paakaraka, and the former Herehere i Moana Marae, located on the coast east of Waiinu Beach. These marae are affiliated with local iwi and hapū with longstanding ancestral connections to the coastal plains, waterways, and dune landscapes that characterise the site. In addition, there are areas of significance to Māori, including statutory acknowledgement areas in proximity and archaeological sites. The project has been designed to avoid known areas of potentially significant cultural value, including identified archaeological sites, indigenous wetlands, and potential sites of historic conflict. In addition, there has been turbine iterations to reduce visual impacts on a nearby marae.

Meridian recognises the importance of understanding and addressing the cultural values associated with the Waiinu Energy Park site. Engagement with affected iwi and hapū has been ongoing since early in the Project development. A summary of this engagement to date is provided in **Appendix 5**.

In addition to the ongoing engagement, a Cultural Effects Assessment (**CEA**) has been commissioned from Te Kaahui o Rauru and prepared by Ngaa Iwi o Taranaki, which will inform the substantive application. The CEA will assess the cultural effects of the proposal and provide recommendations to avoid, remedy or mitigate adverse cultural impacts, including spiritual effects. Meridian also expects that Te Ihupuku Marae will submit a CEA.

Meridian is committed to continuing engagement with tangata whenua throughout the development and implementation of the Project to ensure cultural values are appropriately considered and provided for.

8.1.8 Archaeological and Historical Heritage Effects

Meridian has engaged an archaeologist, Ivan Bruce of Archaeological Resource Management, (who was recommended by mana whenua) to prepare a technical archaeological assessment. An Archaeological Findings Summary has been prepared and is attached as **Appendix 8.**

While the broader Waitootara–Nukumaru district contains a high density of recorded archaeological sites, the Project footprint itself contains only a small number of recorded sites, primarily located on the inland margin of the dune complex. No new archaeological sites were

identified during the field survey, and no sites are located within the eastern dune area of the Project.

Three recorded archaeological sites[2] are located within 200 m of proposed turbine locations and may be affected by earthworks. Although some features (e.g. pits) are visible and can be protected, the full extent of these sites cannot be confidently determined due to the shifting nature of the dune environment. One site[3] has been levelled by farming activities and is no longer visible.

Given these findings, a general archaeological authority is being sought to cover all earthworks during construction. This approach is considered best practice to manage potential effects on known and unknown subsurface archaeological material.

In summary, archaeological effects are expected to be limited and manageable, with appropriate oversight and mitigation through the HNZPT authority process.

8.1.9 Lighting Glint and Glare Effects

Glint and glare effects from solar farms arise from the reflection of sunlight off panel surfaces. Glint refers to momentary flashes of light, while glare involves sustained brightness that may affect visual comfort or visibility. At the Waiinu Energy Park, these effects could potentially impact nearby road users, residents, or aircraft if not properly managed. However, with anti-reflective coatings on panels, strategic array orientation, and site-specific design measures, such effects are anticipated to be minimal and manageable. The proposed solar arrays are sited at some distance from residences, typically with intervening vegetation and topography.

Artificial lighting associated with the Project also has the potential to affect night-time visual amenity and cultural values, including the visibility of the night sky. This includes the ability to observe culturally significant stars such as Puanga. Lighting design will therefore seek to minimise effects through the use of low-intensity, directional, and motion-activated lighting where practicable.

Meridian has commissioned Boffa Miskell to undertake an assessment of lighting, glint and glare effects associated with the Waiinu Energy Park. While the detailed technical assessment is underway and would accompany the substantive application, the potential for adverse effects is expected to be low and manageable.

8.1.10 Noise and Vibration Effects

There are potential noise and vibration effects associated with both the construction activities and ongoing operation of the Waiinu Energy Park.

Meridian has engaged Marshall Day Acoustics to assess and model potential noise and vibration effects associated with the Waiinu Energy Park. An Acoustic Effects Summary has been prepared and is attached as **Appendix 9.**

Operational noise sources include:

- Wind Turbines: Noise levels are predicted to range between 32 and 45 dB LA90(10-min) at assessed receivers under worst-case conditions (rated wind speed of ~9 m/s). These levels are expected to comply with NZS 6808:2010 and are not considered

[2] R22/266, R22/267, and R22/268

[3] R22/268

intrusive. Turbine placement has been informed by acoustic modelling to ensure compliance and minimise effects on nearby dwellings.

- Battery Energy Storage Systems (BESS) and Solar Arrays: Noise levels are predicted to be <20 to 35 dB LAeq, comfortably within the 40 dB LAeq night-time limit under both the South Taranaki and Whanganui District Plans. These sources may be audible at times but are not expected to be intrusive.

The Project design has been iteratively refined to ensure full compliance with relevant acoustic standards.

Construction noise will vary depending on activity and location but is expected to comply with NZS 6803:1999 guidelines. Key findings include:

- Wind Turbine Sites: Located at least 1,000 m from non-involved dwellings. Worst-case construction noise is estimated at ~45 dB LAeq, comparable to a quiet suburban environment.
- Solar Farm Piling: The closest dwelling is approximately 1,282 m away, with predicted noise levels of ~51 dB LAeq, similar to rainfall or a flowing stream.
- BESS Construction: Predicted noise levels are ~34 dB LAeq, likely indistinguishable from existing daytime background noise.

Construction activities will be spread across the site, reducing cumulative impacts. Noise will be intermittent and dynamic, with quieter and louder periods depending on the phase of work.

A Construction Noise and Vibration Management Plan will be prepared to guide best practice mitigation and stakeholder communication.

With the Project designed and operated to comply with relevant acoustic standards, adverse noise and vibration effects are anticipated to be of no significance, with temporary construction effects of short duration. Effects are considered manageable through standard mitigation and design measures.

8.1.11 Aviation Effects

The presence of wind turbines can potentially impact aviation safety by creating obstacles for aircraft. To address this risk, Meridian would ensure that the design and placement of turbines at Waiinu Energy Park comply with all relevant aviation regulations and guidelines. This includes the installation of signal lighting on turbines as required to enhance visibility for aircraft, particularly during low light or poor weather conditions.

By incorporating appropriate turbine lighting and adhering to Civil Aviation Authority (**CAA**) standards, including those relating to CAA radars or other navigation equipment, any risks to aviation safety would be effectively managed and mitigated.

8.1.12 Radio Interference Effects

It is known that wind farms have the potential to cause electromagnetic interference to radio communication signals. Meridian has engaged Kordia to assess potential effects to fixed radio linking services, aeronautical radio navigation services and wide area radio coverage services to ensure that no communication links would be affected by the project.

8.1.13 Hazardous Substances

The use, storage, and handling of hazardous substances during construction and operation of the Waiinu Energy Park would comply with all relevant regulations and best practice guidelines. Hazardous materials would be managed to minimise the risk of spills, leaks, or other incidents that could adversely affect human health or the environment.

Appropriate spill response plans and containment measures would be developed and implemented to ensure any accidental releases are promptly contained and remediated.

8.1.14 Natural Hazards

The design and siting of infrastructure for the Waiinu Energy Park has been carefully planned to avoid areas identified as being at risk from natural hazards. Detailed hazard mapping and geotechnical assessments inform the placement of turbines, access roads, and ancillary facilities to minimise exposure to such risks. This information would comprise part of the substantive application.

Construction methods and design standards would ensure resilience to potential natural hazard events, incorporating best practice engineering and mitigation measures to safeguard both the infrastructure and surrounding environment throughout the Project's operational life.

9. Prohibited Activities (Section 13(4)(i))

For the purposes of Section 13(4)(i) of the FTA, it can be confirmed that the Waiinu Energy Project does not involve any prohibited activities under the Resource Management Act 1991.

10. Persons Affected

10.1 Consultation and Persons Notified

Section 11(1) of the FTA requires an applicant to consult with the following:

(a) the relevant local authorities; and

(b) any relevant iwi authorities, hapū, and Treaty settlement entities, including—

(i) iwi authorities and groups that represent hapū that are parties to relevant Mana Whakahono ā Rohe or joint management agreements; and

(ii) the tangata whenua of any area within the project area that is a taiāpure-local fishery, a mātaitai reserve, or an area that is subject to bylaws or regulations made under Part 9 of the Fisheries Act 1996; and

(c) any relevant applicant groups with applications for customary marine title under the Marine and Coastal Area (Takutai Moana) Act 2011; and

(d) ngā hapū o Ngāti Porou, if the project area is within or adjacent to, or the project would directly affect, ngā rohe moana o ngā hapū o Ngāti Porou; and

(e) the relevant administering agencies; and

(f) if the proposed approvals for the project are to include an approval described in section 42(4)(f) (land exchange), the holder of an interest in the land that is to be exchanged by the Crown.

For the purposes of this Project, the relevant parties are:

- Relevant local authorities: Taranaki Regional Council, Horizons Regional Council, South Taranaki District Council, and Whanganui District Council
- Relevant iwi authorities, hapū, and Treaty settlement entities: Ngaa Rauru Kiitahi / Te Kaahui o Rauru
- Relevant administering agencies: Department of Conservation, Ministry for the Environment, and Heritage New Zealand Pouhere Taonga.

For the purposes of section 11(1)(b)(ii), no part of the project area is within a taiāpure-local fishery, a mātaitai reserve, or an area that is subject to bylaws or regulations made under Part 9 of the Fisheries Act 1996.

Meridian has undertaken consultation with the above parties prior to lodging this application, including ongoing engagement with iwi over the past four plus years. A summary of the consultation undertaken to date is provided in **Appendix 5**.

It is noted that the Fast-track Approvals Amendment Act 2025 introduces amendments to section 11 of the FTA, which come into force on 31 March 2026. As amended, section 11 will require that relevant local authorities, iwi authorities, hapū, Treaty settlement entities, and administering agencies be notified in writing and provided 20 working days to respond, rather than requiring evidence of consultation. As this application is lodged before 31 March 2026, the pre-amendment version of section 11 applies, and the consultation requirements of that section are determinative. The amended notification regime does not apply to this application.

While these amendments are not yet in force, and are therefore not determinative for this application, for completeness it is noted that Meridian has notified each of the relevant parties of

the Proposal and has received responses from a number of those parties. A summary of this engagement is provided in **Appendix 5**, with a summary outlined below.

Person or Group		Date of notification	Form of notification	Comments received
Relevant Local Authorities	Taranaki Regional Council South Taranaki District Council Horizons Regional Council Whanganui District Council	30 January 2026	Via email with a copy of this Referral Application attached to the email.	Refer Appendix 5
Relevant iwi authorities, hapū, and Treaty settlement entities	Ngaa Rauru Kiitahi / Te Kaahui o Rauru	6 Oct 2025	Via email with a copy of this Referral Application attached to the email.	Refer Appendix 5
Relevant administering agencies	Department of Conservation	5 June 2025	Email with outline of the proposal	12 Aug 2025 - Pre-lodgement consultation summary
	Ministry for the Environment	21 May 2025	Email providing outline of proposal and requesting contact at MfE to ensure the referral application is complaint with the FTA.	27 May 2025 – Email provided from System Oversight Team providing initial advice.
	Heritage New Zealand Pouhere Taonga	22 Sep 2025	Email with outline of the proposal and archaeological record	29 Sep 2025 - No initial comments about the proposal but appreciated the archaeological record from the project archaeologist.

10.2 Affected Persons and Groups

In accordance with Sections 13(4)(j) of the FTA, Meridian has identified those persons and groups that are likely to be affected by the Project, provided in Table 2 below.

Table 2: Persons and groups affected in accordance with s13(4)(j)

Person or Group	
Relevant Local Authorities	Taranaki Regional Council South Taranaki District Council Horizons Regional Council Whanganui District Council
Iwi authorities and groups that represent hapū that are parties to relevant Mana Whakahono ā Rohe or joint management agreements	Ngaa Rauru Kiitahi / Te Kaahui o Rauru
Other relevant iwi authorities	N/A
Relevant Treaty settlement entities	Ngaa Rauru Kiitahi
Protected customary rights groups and customary marine title groups	N/A
Ngā rohe moana o ngā hapū o Ngāti Porou	N/A
Marine and Coastal Area (Takutai Moana) Act 2011	N/A
Persons with a registered interest in land that may need to be acquired under the Public Works Act 1981	N/A
Relevant administering agencies	Ministry for the Environment, Department of Conservation, and Heritage New Zealand Pouhere Taonga
Other organisations	Transpower (New Zealand) Limited and New Zealand Transport Agency Waka Kotahi
Affected landowners	Involved landowners and affected landowners as indicated below.

Meridian has endeavoured to meaningfully engage with all affected and interested parties, including those listed in Section 11. A full summary of the engagement undertaken to date is provided in **Appendix 5.**

10.2.1 Involved Landowners

Meridian has comprehensively engaged with the landowners of the properties affected by the Proposal's footprint, and those on adjacent properties. Several of those landowners also own other land outside the project footprint, including on adjacent sites. Meridian is entering into legal agreements with each of the landowners within the Project footprint.

10.2.2 Affected landowners

Through preliminary environmental assessment, namely the landscape and visual impact assessment, affected properties have also been identified as affected to varying degrees for the purpose of Section 14(4)(j). Those landowners include the involved landowners indicated

above, along with the landowners on nearby properties. Engagement has begun and is ongoing with these landowners and with the general community.

10.3 Treaty Settlements

There is one Treaty Settlement relevant to the Project, being the Ngaa Rauru Kiitahi Deed of Settlement 2003, and the associated Ngaa Rauru Kiitahi Claims Settlement Act 2005. A summary of the relevant principles and provisions of that settlement is provided below in accordance with Section 13(4)(l) of the FTA.

Ngaa Rauru Kiitahi Claims Settlement Act 2005 provides the legislative framework that furthers the agreements expressed in the Deed of Settlement, including the revitalisation of Ngaa Raurutanga, between the Crown and Ngaa Rauru Kiitahi. This legislation recognises the special relationship of Ngaa Rauru Kiitahi with the land and resources, including those used and affected by the proposal.

A key aim of the settlement is to support the revitalisation of Ngaa Raurutanga, including the cultural identity, values, practices, and ongoing relationship of Ngā Rauru Kītahi with their ancestral lands, waters, and resources. The legislation recognises this special relationship, including those resources used and affected by the proposal.

The Crown acknowledges the cultural, spiritual, historical, and traditional association of Ngaa Rauru Kiitahi with uukaipoo sites, and statutory acknowledgement areas which include Nukumaru Recreation Reserve, and Tapaurau Conservation Area. Both of those areas are outside the project footprint but are in close proximity.

Nukumaru Recreation Reserve

Nukumaru Recreation Reserve is located on the coast between Waiinu and Tuaropaki. Ngaa Rauru Kiitahi traditionally camped at Waikaramihi (within Nukumaru Recreation Reserve) from October to March each year. The main food gathering area was between the Waitootara river mouth and Tuaropaki. The sources of food include kākahi (fresh water mussels), sea mussels, kina, paua, pāpaka (crabs), karengo (seaweed), and very small octopus stranded in the small rock pools from the receding tides. While Ngaati Maika and Ngaati Ruaiti were the main hapuu that used Waikaramihi, all Ngaa Rauru Kiitahi hapuu traditionally gathered kai moana in accordance with the values of Ngaa Raurutanga.

The Karewaonui canoe (over 100 years old) was, until 1987, housed at Waikaramihi and was used by Ngaa Rauru Kiitahi (mainly Ngaati Maika and Ngaati Ruaiti) to catch stingray, shark, snapper, and hāpuka up to about 10 miles off the coast. Karakia were used when Karewaonui was “put to sea”, and an offering of the first fish caught on Karewaonui was always given to the Kaitiaki-o-te-moana.

Hawkens Lagoon (Tapuarau) Conservation Area

Tapuarau is the name given to the area at the mouth of the Waitootara River within the Tapuarau Conservation Area. The main hapuu of Ngaa Rauru Kiitahi that used Tapuarau included Ngaati Hine Waiatarua, Ngaati Hou Tipua, Ngaa Ariki, and Ngaati Ruaiti. Ngaa Rauru Kiitahi has long used Tapuarau as a seasonal campsite from where it has gathered mahinga kai in accordance with the values of Ngaa Raurutanga. Tapuarau extends from the mouth of the Waitootara River to Pukeone and includes several small lagoons, including Tapuarau Lagoon, which are the source of tuna, flounder, mullet, whitebait, and inanga. During flooding, Ngaa Rauru Kiitahi was able to take tuna as it attempted to migrate from the nearby lagoons to the river mouth. The former marae named Hauriri was also situated in this area.

Both sites are still significant to Ngaa Rauru Kiitahi as a mahinga kai source from which the physical well-being of Ngaa Rauru Kiitahi is sustained, and the spiritual well-being nourished.

The purpose of the statutory acknowledgement area is to:

- to require consent authorities, the Environment Court, and Heritage New Zealand Pouhere Taonga to have regard to the statutory acknowledgements,
- to require relevant consent authorities to forward summaries of resource consent applications to the governance entity; and
- to enable the governance entity and a member of Ngaa Rauru Kiitahi to cite the statutory acknowledgements as evidence of the association of Ngaa Rauru Kiitahi with the relevant statutory areas.

Engagement with Mana Whenua

Meridian Energy is actively working with Ngaa Rauru Kiitahi to recognise and provide for the relevant principles and provisions of the Ngaa Rauru Kiitahi Deed, and associated Settlement Act 2005. This is being achieved through ongoing engagement with mana whenua and through the commissioning a Cultural Effects Assessment (**CEA**) to ensure that the perspectives, values, and concerns of mana whenua are meaningfully considered in the Project's development.

This process reflects Meridian's commitment to genuine partnership and collaboration with iwi, giving effect to the Company's commitments related to Te Tiriti o Waitangi. The CEA will inform Project design, mitigation measures, and ongoing engagement, ensuring that the cultural, spiritual, and historical significance of the area is respected and upheld.

Meridian's approach aligns with best practice in recognising Māori values in environmental decision-making and supports the broader goals of cultural sustainability and intergenerational wellbeing.

10.3.1 Iwi Management Plans

Ngaa Rauru Kaiitahi Pūtaiao Management Plan (**PMP**) is a relevant iwi management plan. The PMP describes Ngaa Rauru Kaiitahi values, mātauranga, and expectations in relation to the management of natural and physical resources within their rohe, and is intended to guide resource users, councils, and decision-makers in giving effect to Te Tiriti o Waitangi and the Ngaa Rauru Kaiitahi Claims Settlement Act 2005.

Meridian Energy has had regard to the PMP in the development of the Project and is working with Ngaa Rauru Kaiitahi to recognise and consider the direction set out in the plan. This is being undertaken through ongoing engagement with mana whenua, and through the preparation of a CEA to support the substantive application.

10.4 How Consultation has Informed Project Shaping

As outlined in Appendices 5 and 6, and for the purposes of section 13(4)(k)(ii), the Project has been shaped through consultation and engagement with the community, mana whenua, and stakeholders. This has informed a number of design iterations, including the reconfiguration and removal of turbines, to avoid or reduce potential adverse effects.

Key outcomes of this project shaping include:

- Avoiding the use of Waiinu Beach Road for major heavy construction traffic, thereby reducing potential effects on local road users
- Reviewing turbine locations in proximity to Te Ihupuku Marae to reduce visual effects and avoid archaeological sites, resulting in the removal of three turbines
- Refining turbine positions to incorporate additional setbacks from identified ecological habitats, based on advice from ecologists and feedback from the Department of Conservation, and
- Removing the four turbines closest to Waiinu Beach following feedback from Waiinu Beach residents through the open day and subsequent meetings, as well as further input from landscape experts.

In addition, feedback received through ongoing engagement is continuing to inform the preparation of the substantive application, including the refinement of mitigation measures and management approaches to address identified effects.

10.5 Public Works Act

For the purposes of Section 13(4)(m) of the FTA, it can be confirmed that no processes have or would be undertaken in accordance with the Public Works Act 1981 in relation to the Project.

10.6 Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019

For the purposes of Section 13(4)(n) of the FTA, the Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019 is not relevant to the Project.

10.7 Māori Land and Features

For the purposes of Section 13(4)(o) of the FTA, a map showing the spatial location of Māori land, marae and identified wāhi tapu within the Project area is provided as **Appendix 2** to this application. A further description of those values has also been provided in Sections 5.2 and 10.3 above.

11. Information relating a determination under Sections 23 or 24

For the purposes of Sections 13(4)(p)-(r) of the FTA, no determinations are sought under Sections 23 or 24 of the FTA.

12. What is needed to complete Project

12.1 Applicant's Legal Interests

In regard to Section 13(4)(s) of the FTA, Meridian has or will hold a legal interest in the land on which the Waiinu Energy Park is proposed to be located through a series of lease agreements with the respective landowners. These agreements have or are being entered into as part of negotiated civil arrangements, providing Meridian with the necessary rights to access, develop, construct, and operate the Project across the various parcels of land.

These lease arrangements provide a secure and legally enforceable basis for Meridian to undertake all aspects of the Project, including site investigations, construction, and ongoing operation. No constraints have been identified that would prevent Meridian from lawfully exercising its rights under these agreements or from carrying out the proposed activities as part of the Waiinu Energy Park.

12.2 Approvals Sought

For the purposes of Sections 13(2)(d) and 13(4)(t) of the FTA, the Project seeks all necessary land use consents, water permits, discharge permits, archaeological authorities and Wildlife Act authorities to undertake the activities described within the Fast-track Referral Application including the following approvals:

- Land Use Consent(s) in accordance with Section 9 of the Resource Management Act 1991 (**RMA**) for the construction and use of the Project;
- Land Use Consent(s) in accordance with Section 13 of the RMA for the construction and use of the Project;
- Water Permit(s) in accordance with Section 14 of the RMA for the construction and use of the Project;
- Discharge Permit(s) in accordance with Section 15 of the RMA for the construction and use of the Project;
- Archaeological Authority in accordance with the Heritage New Zealand Pouhere Taonga Act 2014; and
- Wildlife Act Authority in accordance with the Wildlife Act 1953 to catch, handle and track bittern and bats, and to trap handle and relocate lizards, and for potential incidental or unintended mortality from catching and releasing lizards.

The Substantive Application will provide a detailed evaluation of all relevant authorities required under the relevant legislation and planning documents.

For completeness, it is confirmed that approvals are not required nor sought under the Conservation Act 1987, Reserves Act 1977, National Parks Act 1980, Freshwater Fisheries Regulations 1983, Exclusive Economic Zone and Continental Shelf (Environmental Effects) Act 2012, Crown Minerals Act 1991 or Public Works Act 1981.

13. Other Matters

13.1 Previous Applications or Authorisations

For the purposes of Section 13(4)(u) of the FTA the activities that form part of the Waiinu Energy Park have not been the subject of any application or decision under a specified Act.

No resource consents, designations, or other statutory approvals have previously been sought or granted for any component of the Project under the Resource Management Act 1991 or other relevant legislation.

13.2 Impact of Climate Change and Natural Hazards

The Waiinu Energy Park has been designed to be resilient to the potential effects of climate change and natural hazards. In particular, the siting of the Project infrastructure avoids areas known to be vulnerable to flooding, coastal erosion, and land instability. The Project's location is set back from the coastline and major waterways, provides a natural buffer against sea level rise and storm surge effects associated with climate change.

Construction and infrastructure design would incorporate best-practice engineering and risk mitigation measures to ensure long-term resilience, including structural integrity of turbine foundations, durability of transmission infrastructure, and erosion and sediment control measures appropriate for extreme weather events.

In doing so, the Project is expected to maintain functionality and safety under a range of plausible future climate conditions and natural hazard scenarios.

13.3 Multiple Applicants

The referral application is lodged by one party, who would be the only application for the substantive approvals required for the Project, and therefore Section 13(4)(w) of the FTA is not applicable.

13.4 Compliance and Enforcement

For the purposes of Section 13(4)(x) of the FTA, no compliance or enforcement actions have been taken against Meridian.

Meridian is a publicly listed company on the NZX and ASX and publishes an Integrated Annual Report each year. These reports provide a comprehensive overview of the company's financial, environmental, social, and governance performance, including any compliance or enforcement matters.

A review of Meridian's Integrated Annual Reports for the past five years confirms that there have been no significant instances of non-compliance with environmental laws or regulations during any reporting period[4]. Meridian has consistently maintained full compliance

[4] See Page 175 of https://www.meridianenergy.co.nz/public/Investors/Reports-and-presentations/Annual-results-and-reports/2024/Meridian-Integrated-Report-June-2024.pdf ; Page 41 of https://www.meridianenergy.co.nz/public/Investors/Reports-and-presentations/Annual-results-and-reports/2023/Meridian-Integrated-Report-June-2023.pdf ; Page 34 of

with consented and regulatory requirements, including those related to wind energy and environmental management.

In addition to demonstrating compliance, the reports highlight Meridian's proactive environmental initiatives, including:

- High waste diversion rates in their Projects, with Harapaki Wind Farm achieving 89% waste diversion and Ruakākā Battery achieving 99% waste diversion.
- Improved environmental performance of replacement Projects, including the reconsenting of the Waitaki Hydro Scheme and the continuation of the elver trap and transfer programme;
- Implementation of an audited Environmental Management System; and
- Integration of Te Tiriti o Waitangi principles and Te Ao Māori strategy into environmental decision-making.

This consistent track record reflects Meridian's strong commitment to environmental stewardship and regulatory compliance.

https://www.meridianenergy.co.nz/public/Investors/Reports-and-presentations/Annual-results-and-reports/2022/Integrated-Annual-Report-30-June-2022.pdf ; Page 64 of https://www.meridianenergy.co.nz/public/Investors/Reports-and-presentations/Annual-results-and-reports/2021/2021-Meridian-Integrated-Report.pdf ; and Page 81 of https://www.meridianenergy.co.nz/public/Investors/Reports-and-presentations/Shareholder-meetings/2020/Meridian-Energy-Integrated-Report-for-year-ended-30-June-2020-v2.pdf

14. Matters Relating to Specific Proposed Approvals

Section 13(4)(y)(i) and Clause 2 of Schedule 5 of the FTA require additional information to be provided where an approval is sought for resource consent under the RMA. Consideration of those relevant matters is provided below.

14.1 Statutory Assessment

Clause 2(1)(a) requires an assessment of the Project against:

- any relevant national policy statement; and
- any relevant national environmental standards; and
- if relevant, the New Zealand Coastal Policy Statement.

14.1.1 National Policy Statement for Renewable Electricity Generation

The National Policy Statement for Renewable Electrical Generation (**NPS-REG**) provides guidance for local authorities on how renewable electricity generation should be dealt with in Resource Management Act 1991 planning documents. The NPS-REG applies to renewable electricity generation activities at any scale and covers the construction, operation and maintenance of structures associated with renewable electricity generation.

The one objective of the NPS-REG is as follows:

(1) The objective of this National Policy Statement is to:

(a) ensure the national, regional and local benefits of REG are provided for;

(b) enable REG capacity and output to significantly increase;

(c) enable REG to support the social, economic and cultural wellbeing of people and communities, and for their health and safety;

(d) enable REG to provide greater security of electricity supply and resilience to supply disruptions to all people and communities;

(e) enable REG to support achieving New Zealand's emission reduction target and implementation of the emissions reduction plan under the Climate Change Response Act 2002; and

(f) ensure REG is developed and operated in a safe, efficient and effective manner while managing the adverse effects from or on REG activities.

The policies that implement this objective of relevance to the project are:

- Recognising the benefits of renewable electricity generation activities (Policy A).
- Recognising and providing for cumulative gains of renewable electricity generation capacity (Policy B).
- Recognising and providing for the operational and functional need of renewable electricity generation activities to be located where the wind resource is

available and where connection to the electricity network is practicable (Policy C).

- Recognising and providing for Māori interests through taking into account the outcome of engagement undertaken with tangata whenua (Policy E).
- Enabling renewable electricity generation activities across all environments, while managing adverse effects through avoidance, mitigation, adaptive management, and, where necessary, offsetting or environmental compensation (Policy F).

This Project acknowledges and promotes the benefits of renewable electricity generation, including reducing greenhouse gas emissions and contributing to sustainable development.

The proposal would improve the security of electricity supply at local, regional, and national levels, providing significant economic benefits to the country. It would support industries that are reliant on New Zealand's electricity prices remaining internationally competitive.

Consistent with Policy C, the Project is proposed in a location that benefits from a viable and high-quality wind resource and where connection to the existing electricity network is practicable. The proposal therefore reflects the operational and functional requirements of renewable electricity generation and does not rely on alternative sites being demonstrably unavailable.

The Project has been designed to enable renewable electricity generation while managing potential adverse effects in accordance with Policy F. Detailed assessments will be provided through the substantive application, but as indicated in Section 8, adverse effects can be appropriately managed through mitigation measures to ensure significant adverse effects are avoided, and other effects appropriately minimised, remedied, offset or compensated.

Engagement with tangata whenua has been undertaken in recognition of Māori interests and values and will continue as the application progresses to the substantive application. The outcomes of that engagement inform Project design and assessment, consistent with Policy E.

14.1.2 National Policy Statement for Freshwater Management

The National Policy Statement for Freshwater Management 2020 (**NPS-FM**) sets a national policy framework for managing freshwater quality and quantity. It seeks to prioritise the well-being of water bodies and freshwater systems, health and needs of people, and the well-being of communities now and in the future. The policies relevant to this proposal seek to ensure there is no further loss of extent of natural inland wetlands, their values are protected, and their restoration is promoted, habitats of indigenous freshwater species and freshwater values are improved.

The Ecology Memo attached as **Appendix 6** to this referral application outlines the identification of wetlands and rivers within the site or within proximity of the site. The siting of infrastructure and roads will avoid or minimise effects on those natural features. Where works within or directly adjacent to wetlands and rivers cannot practically be avoided, effects will be appropriately managed in accordance with the effects management hierarchy. For these reasons, the proposal is not inconsistent with the NPS-FM.

14.1.3 National Policy Statement on Highly Productive Land

The National Policy Statement on Highly Productive Land (**NPS-HPL**) seeks to protect highly productive land for use in land-based primary production both now and for future generations.

Based on the interim definition of 'highly productive land', being LUC 1-3 land, all highly productive land in the area will be avoided by the Project.

14.1.4 National Policy Statement for Indigenous Biodiversity

The National Policy Statement for Indigenous Biodiversity (**NPS-IB**) seeks to protect significant natural areas and maintain indigenous biodiversity throughout Aotearoa New Zealand. Clause 1.3(3) of the NPS-IB expressly states that the provisions do not apply to the development, operation, maintenance or upgrade of renewable electricity generation assets and activities and electricity transmission network assets and activities.

Nevertheless, the project design has sought to minimise adverse effects on significant natural areas or significant indigenous fauna, through such measures as setback from identified SNAs, minimising waterbody crossings and avoiding natural corridors.

14.1.5 New Zealand Coastal Policy Statement

The New Zealand Coastal Policy Statement (**NZCPS**) provides national direction for the management of the coastal environment. The direction applies both to local government in preparation planning documents that affect the coastal environment, and to consent applicants for activities that are within or directly adjacent to the coastal environment.

The Project footprint has been designed to avoid being within the coastal environment: therefore, the NZCPS would not directly apply to the substantive proposal. The internal 33kV transmission line connecting the western and eastern parts of the Energy Park would be trenched underground to avoid affecting the coastal environment, including under the Waitootara River.

However, the coastal environment, including areas of outstanding natural character, is located adjacent to the site. The Landscape Memo attached as **Appendix 6** of this referral application notes that the design and siting of infrastructure will ensure adverse effects on the coastal environment are appropriately managed with no significant adverse landscape effects.

14.1.6 National Environmental Standards for Freshwater

The National Environmental Standard for Freshwater Management (**NES-F**) came into effect in September 2020 as part of the Freshwater Package and is intrinsically linked to the 2020 version of the National Policy Statement for Freshwater. The NES-F provides a set regulation relating to specific to works within the margins of rivers and natural inland wetlands.

Due to the presence of rivers and wetlands within the Project footprint or in the proximity, it is likely that the NES-F will apply, insofar as culvert crossings and/or earthworks within proximity to wetlands are required. Conservatively, Regulations 45 and 71 would apply – which would trigger the need for land use consent(s) as a discretionary activity. Should those regulations apply, the Project will meet the requirements of the regulations: specifically, if Regulation 71 applies, subclause (6) will be met as:

- The specified infrastructure would provide significant national and regional benefits;
- There is a functional need for the infrastructure to be located in that environment; and
- The effects management hierarchy would be followed in managing adverse effects to the extent there would be no significant adverse ecological effects.

14.1.7 The National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health

The National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health (**NES-CS**) sets out nationally consistent standards to ensure land that has been contaminated by historical land use is identified and appropriately managed and remediated when soil disturbance or changes in land use are proposed. Under section 43D of the RMA, the standards prevail over any designation that is made subsequent to the standard coming into effect.

The standards apply to any change in land use proposed as part of the Project where it is located over a HAIL site. As noted, a Preliminary Site Investigation has been undertaken which identifies seven HAIL sites and six potential HAIL sites within and adjacent to the Project site. For the purposes of the referral application, it will be conservatively assumed Regulation 11 will apply under the assumption that it is not practicable to undertake a Detailed Site Investigation over the entire site given its extensive nature.

14.1.8 The National Environmental Standard for Electricity Transmission Activities

The Resource Management (National Environmental Standards for Electricity Transmission Activities) Regulations 2009 (**NES-ETA**) sets out nationally consistent regulations for the operation, maintenance, and upgrading of existing high voltage electricity transmission lines within the National Grid.

The Project will include a connection between the substation and its connection to the existing 220 kV line. While full details are yet to be confirmed, for the purpose of this referral application, it is conservatively assumed the works trigger Regulations 9, 15 and 16.

14.1.9 Regional and District Planning Direction

While not required by Clause 2(1)(a), for completeness, and to ensure full visibility of the matters identified in section 22(2) of the FTA, a high-level review of the relevant regional and district planning framework has been undertaken. The following statutory planning documents apply to the proposal:

- Taranaki Regional Policy Statement
- Horizons Regional Policy Statement (as given effect through the One Plan)
- Horizons One Plan
- Taranaki Regional Freshwater Plan
- South Taranaki District Plan
- Whanganui District Plan

At a regional policy level, both the Taranaki Regional Policy Statement and the Horizons Regional Policy Statement recognise the national and regional significance of renewable electricity generation and provide for its development, operation, maintenance, and upgrading. This direction is consistent with national direction, including the National Policy Statement for Renewable Electricity Generation (NPS-REG), which requires decision-makers to recognise and provide for the benefits of renewable electricity generation (Objective A and Policies A and B).

At the same time, the regional policy framework adopts an integrated management approach, requiring that adverse effects on the environment are appropriately avoided, remedied, or mitigated. In particular, both Regional Policy Statements include objectives and policies relating to:

- the preservation of the natural character of the coastal environment[5] (e.g. giving effect to section 6(a) of the RMA);
- the identification and protection of significant indigenous vegetation and habitats of indigenous fauna[6] (section 6(c));
- the protection of outstanding natural features and landscapes and the maintenance of amenity and landscape values[7] (section 6(b)); and
- the recognition and provision for the relationship of Māori with their ancestral lands, water, sites, wāhi tapu, and other taonga[8] (section 6(e)).

At a regional plan level, the Horizons One Plan and the Taranaki Regional Freshwater Plan generally provide for activities within and adjacent to waterbodies, subject to the implementation of best practice measures. This includes requirements relating to erosion and sediment control, minimising disturbance to riverbeds and margins, maintaining fish passage, and protecting water quality and ecological values.

At a district plan level, the project area is located within rural zones under both the South Taranaki District Plan and the Whanganui District Plan, where renewable electricity generation activities are generally anticipated, subject to an effects-based assessment.

Under the Whanganui District Plan, the site spans the Rural Production Zone and General Rural Zone, with renewable electricity generation addressed through the Network Utilities chapter. The associated assessment criteria require consideration of a broad range of effects, including landscape and visual, ecological, cultural, transport and access, and cumulative effects. In addition, the Coastal Environment Special Management Zone applies along the coastal margin and introduces further considerations relating to natural character, coastal processes, and landscape values.

Under the South Taranaki District Plan, the site is located within the Rural Zone, with renewable electricity generation similarly addressed through an integrated energy and infrastructure framework. The Plan also identifies a number of areas with special characteristics in proximity to the site, including Significant Natural Areas (e.g. SNA 31 and 33), areas of Outstanding Natural Character (ONC3), Outstanding Natural Features and Landscapes (ONFL 7), and the Coastal Protection Area. The objectives and policies applying to these overlays set clear expectations for the protection of ecological, landscape, and coastal values.

Both District Plans contain strong Tangata Whenua provisions, including objectives and policies that recognise the relationship of Māori with their ancestral lands, water, sites, wāhi tapu, and other taonga (consistent with section 6(e) of the RMA), and provide for Māori land development and engagement with iwi and hapū. Both Councils have emphasised the importance of meaningful and ongoing engagement with tangata whenua.

[5] CNC Policy 2 and Policy 4 of the Taranaki Regional Policy Statement, CE-O1 and CE-P1 of Horizon's One Plan.

[6] Chapter 9 and BIO Policy 4 of the Taranaki Regional Policy Statement, and ECO-P2 and Schedule 5 of Horizon's One Plan.

[7] NFL Policies 1-3 of the Taranaki Regional Policy Statement, and NFL-01 and NFL-P2 of Horizon's One Plan.

[8] Provided throughout the relevant topic based objectives and policies of the Taranaki Regional Policy Statement and Horizon's One Plan.

The project has been shaped having regard to this planning framework, including by seeking to avoid significant ecological areas and sensitive landscape features identified in the relevant planning documents. Engagement with mana whenua has been initiated early, is ongoing, and will be supported by a Cultural Effects Assessment. Technical assessments are being prepared in accordance with relevant policy direction and best practice methodologies, including application of recognised ecological significance criteria and standard erosion and sediment control measures.

A comprehensive assessment of the proposal against the relevant objectives, policies, and rules of the applicable planning instruments will be provided as part of the substantive application.

14.2 Section 30 of the FTA

For the purposes of Clause 2(1)(b), there are no existing resource consents of the type referred to in s30(3)(a).

14.3 Standard Freshwater Fisheries Activity

Section 13(4)(y)(vi) requires specified information where a project includes a standard freshwater fisheries activity, or an approval described in section 42(4)(j). While the proposal includes culvert crossings, these will be designed and constructed to maintain fish passage. Accordingly, the project does not involve a standard freshwater fisheries activity, nor does it require an approval under section 42(4)(j).

15. Conclusion

Through this application, Meridian is seeking to have its Waiinu Energy Park Project referred to the fast-track approvals process under the FTA.

The Project fully meets the criteria to be accepted as an eligible referral application under Section 22 of the FTA as:

- The Project is an infrastructure development Project that would have significant regional or national benefits
- Referring the Project to the fast-track approvals process—
  - would facilitate the Project, including by enabling it to be processed in a more timely and cost-effective way than under normal processes; and
  - is unlikely to materially affect the efficient operation of the fast-track approvals process
- The Project has been identified as a priority through its alignment with several central and local government strategies and plans. These include:
  - The New Zealand Energy Strategy (MBIE, 2024), which supports the electrification of the economy and sets a target of 100% renewable electricity by 2030;
  - The New Zealand Infrastructure Strategy 2022–2052 (New Zealand Infrastructure Commission / Te Waihanga), which identifies clean electricity as critical to achieving net-zero carbon emissions;
  - The Emissions Reduction Plan (Ministry for the Environment), which includes actions to accelerate the development of new renewable electricity generation;
  - The National Policy Statement for Renewable Electricity Generation (NPS-REG), which provides for the development, operation, maintenance, and upgrading of renewable electricity generation activities;
  - Regional policy statements such as the Horizons One Plan and the Taranaki Regional Policy Statement, both of which support increased use of renewable energy resources; and
  - District plans from South Taranaki District Council (STDC) and Whanganui District Council (WDC), which provide a supportive framework for renewable energy development.
  - The Fast-Track Projects Advisory Group Report to Ministers in August 2024 identified this project as a High Priority renewable energy project[9].
- The Project will deliver significant economic benefits
- The project will bring significant national benefit by helping to bring and maintain forward and futures prices of electricity in line with the long run marginal cost of generation
- The Project will support primary industries through the supply of electricity for agricultural processes and services

[9] https://environment.govt.nz/assets/acts-and-regulations/acts-and-bills/fast-track-projects-advisory-group-report-to-ministers-redacted.pdf

- The Project will support development of natural resources through the supply of electricity for mining, quarrying and related processes and services
- The Project will support climate change mitigation, including the reduction or removal of greenhouse gas emissions
- The Project has been sited and designed to avoid or minimise significant adverse environmental effects beyond localised effects
- Localised adverse effects resulting from the construction and operation of the proposed Energy Park have been minimised to the extent practicable through site design and can be appropriately controlled by way of conditions and the application of best practice management methods
- The Project recognises and provides for the cultural values and associations of Ngaa Rauru Kiitahi, including those identified through the Ngaa Rauru Kiitahi Claims Settlement Act 2005, and has been informed by ongoing engagement with mana whenua. This engagement, including the preparation of a Cultural Effects Assessment, will continue through the substantive application to ensure that cultural values, mātauranga Māori, and opportunities to support the revitalisation of Ngaa Raurutanga are appropriately recognised and provided for
- Any adverse effects on the environment are not out of proportion to the Project's regional or national benefits.

All of the information required under Section 13 of the Act has been provided with sufficient detail to demonstrate there are no grounds on which the referral application should be declined.

Appendix 1: Map of Project Area and Boundaries (Section 13(4)(d))

Appendix 2: Map of Māori Land, Marae, and Wāhi Tapu Sites (Section 13(4)(o))

Appendix 3: National and Regional Economic Benefits to the Energy Market

Appendix 4: Strategic Alignment and Economic Benefits Assessment

Appendix 5: Consultation and Engagement

Appendix 6: Landscape and Visual Effects Memorandum

Appendix 7: Ecological Effects Memorandum

Appendix 8: Archaeological Findings Summary

Appendix 9: Acoustic Effects Memorandum